1 coil. Is SBC willing to work with me to try to

2 have that conditioning completed within that

3 next five days?

4   MS. CHAPMAN: We did take that

5 back to our network folks to find out whether or

6 not we would be able to accommodate that type of

7 request, and the answer we received was that,

8 no, they needed the ten days, that they can't do

9 that within a five-day period.

10   The information we give on the loop

11 qualification, whether it's a manual or LFACS,

12 is the information that we've got. We don't

13 know ahead of the provisioning time when you

14 would get your jeopardy that that information is

15 incorrect. So it's not that we've got this

16 information we're hiding from you. It's just

17 that we gave you what we've got, and that is --

18 and we understand it is a risk that everybody

19 runs. It impacts everybody equally.

20   And as I've said before, when we did

21 have a retail offering, that's was part of what

22 we told our customers in our speech, and then

23 you kind of just have to plan your service

24 accordingly knowing that there are going to be

25 circumstances where that may happen where the

1 records may either be inaccurate, or, in the

2 alternative, there's also occasions where

3 because the network is dynamic and changes all

4 the time where what was available when you

5 originally did loop qual may not be what's

6 available when you placed your order.

7   So there is that change as well. So

8 it's not necessarily that the records were

9 inaccurate in all cases. Sometimes it may be

10 that the records are inaccurate, but --

11   MS. GENTRY: Clarify a step

12 further, if would, please. I understand what

13 you just told me, and I am interpreting what you

14 told me is when I've gone into actuals, which is

15 the LFACS database, at this point your position

16 is you will not expedite the order; that I would

17 have to resubmit or accept the order to have the

18 conditioning done and it's ten more days.

19   MS. CHAPMAN: That is correct.

20   MS. GENTRY: Now take me to a

21 manual situation. And we acknowledge here in

22 Texas we have an interim rate of ten cents for a

23 manual. Pardon me?

24   MS. CHAPMAN: Actually, we don't

25 have any rate for manual at this point.

1   MS. GENTRY: Excuse me. I'm

2 sorry.

3   MS. CHAPMAN: We're doing a lot of

4 work for nothing right now.

5   MS. GENTRY: We have an interim

6 rate of zero, whatever it is at the moment. But

7 you have a proposed rate --

8   MS. CHAPMAN: Sure.

9   MS. GENTRY: -- that you've talked

10 about that is in the $80 range; that if we trued

11 up and your rate happened to prevail, we are

12 talking about an $80 rate.   So let's go over

13 the fact that you believe it costs you some

14 amount of money to do a manual loop qual.

15   I believe what that means is I ask for

16 a manual loop qual. You actually have a

17 physical person do some research on your

18 appropriate records -- I don't care where and

19 how he does it -- but he goes and looks at

20 records. So what I'm paying for is time and his

21 knowledge to be able to bring me back a loop

22 qual.

23   MS. CHAPMAN: That's correct.

24   MS. GENTRY: Now, With that

25 scenario, you also have X amount of days that

1 you do that for me, and I believe it's three to

2 five.

3   MS. CHAPMAN: Three in Texas, but

4 three to five everywhere else.

5   MS. GENTRY: It depends. Again,

6 the point, I theoretically have paid a price for

7 you to do this work. You have a qualified

8 technician doing the work. On due date, he

9 gave me -- because we are getting incorrect

10 information off manuals.

11   MS. CHAPMAN: Well, if our records

12 are incorrect, you're going to get --

13   MS. GENTRY: Not LFACS, manual.

14   MS. CHAPMAN: Well, manual is

15 still our records. If our records are

16 incorrect, you're going to get incorrect

17 information because that's all we've got. We're

18 not physically going out and testing the loop.

19 However, now if the reason you got incorrect

20 information because our engineer made a mistake,

21 then I think that's a separate issue as opposed

22 to you got incorrect information because our

23 record showed something. We gave you what the

24 record showed, and then the engineer did all his

25 work correctly. He pulled the records

1   correctly, and he provided that information to

2   you. That's what we're obligated to do under

3   UNE remand, provide you what we have.

4   That's one situation. There is another

5   situation where the engineer, you know, just

6   didn't do his job well, and he looked at the

7   records and wrote down wrong or something like

8   that. So there are two scenarios.

9   The first one where the engineer gave

10 you the records that we had, and he gave them to

11 you correctly, it's just they didn't match the

12 loop that you actually got, that's the same as

13 the LFACS. It's the same information. He's

14 just looking -- instead of looking at the

15 records in an electronic system, he's looking

16 them up on paper.

17   Now the other situation would be where

18 he made a mistake.

19   MR. SRINIVASA: Are you familiar

20 with the new PMs that are approved by the

21 Commission on database accuracy?

22   MS. GENTRY: Yes.

23   MR. SRINIVASA: There are certain

24 provisions in there as it relates to DSL, I

25 believe.

1   MS. GENTRY: I have to go back and

2   look -- I know what you're referencing.   I don't

3   remember the specifics of them, sir.

4   Where I was going is we get some where

5   the field isn't populated, or it is populated

6   with zeros which means the field isn't populated

7   on a manual.   So he didn't comprehensively do

8   his whole job and he sent them back to us.

9   What I'm trying to find is I have

10   enough of those that I'm asking for an expedite

11   process.   I'm also not enamored with -- I assume

12   at some point you're going to true up to the

13    $80.   I am not enamored with paying that price

14   for -- I think there needs to be some

15   repercussions for someone at SBC not having done

16   a comprehensive job.

17   MS. CHAPMAN: I think in the case

18   where the engineer did not complete it

19   correctly, not where -- I'm not addressing the

20   issue where the records just don't match up, but

21   where the engineer was in error, we would be

22   willing to accept an expedite.   Now, that would

23   follow the standard expedite rules.

24   For the expedite we have to go to the

25   impacted department to see if they can work it

1 within a shorter interval, so there's still not

2 a committed date, but we go to all the

3 departments and we see if we can expedite it.

4 In a lot of cases we can get a shorter interval.

5   And that -- yes, we definitely would be

6 willing to do that where it's something that is

7 a mistake take on our part as opposed to, you

8 know, we did the job, we did exactly what we are

9 supposed to do, we pulled the information, the

10 engineer did everything right and we gave you

11 what we had. And like, as you said before, if

12 there was a rate associated with it, it would be

13 for the time and the effort that the engineer

14 did to do that, and that is what he would do.

15   MS. GENTRY: So those expedites

16 you're telling me to handle on an ICB basis with

17 the LOC as they occur.

18   MS. CHAPMAN: Yeah, they would go

19 through the LOC. There's actually a field on

20 the LSR that you populate, expedite/why, and the

21 LOC would have to go in conjunction with the LSC

22 and contact the departments downstream to see if

23 we'll be able to meet your expedited date. But

24 we would be willing to accept an expedite and to

25 do that in those situations where it was a

1   Southwestern Bell error.

2   MS. GENTRY: And that you would

3   also credit back for loop qual that he did not

4   do accurately?

5   MS. CHAPMAN: Well, it would be a

6   billing issue. It would be something that you

7   need to do on a billing basis, but that is

8   something that we typically do on things that

9   are billed. If there's something that we've

10 done incorrectly, a lot of times we will give

11 credits in those situations. So those would be

12 things we have to research on those individual

13 ones. Yeah.

14   MS. LOPEZ: Carol, let me ask a

15 question on this. When you are doing -- when

16 Southwestern Bell is doing a manual loop qual,

17 do they also go and check that against LFACS?

18 Because when the engineer writes the job and the

19 cable transfers are actually occurring, LFACS is

20 actually -- once the cut is completed, LFACS is

21 updated because LFACS is what is assigning the

22 pairs.

23   And so I'm just wondering on these

24 manual look-ups, is somebody actually going to

25 LFACS to compare those discrepancies to see--

1 when they do a manual loop makeup, do they also

2 do an LFACS loop makeup to see if there is any

3 major difference?

4   MS. CHAPMAN: When they do a

5 manual loop makeup, the actual screen they

6 get -- any information we already have in LFACS

7 is provided to the engineer. So, yes, they

8 would also see the LFACS information when they

9 were -- if we had any for that address, they

10 would have that to look at while they were doing

11 the manual.

12   MS. LOPEZ: I know before the

13 records -- the posting of the records was quite

14 some time behind in being completed; whereas,

15 because LFACS is updated as soon as the cut is

16 complete, LFACS is probably a little bit more

17 accurate or actually a lot more accurate if they

18 haven't updated the records.

19   MS. CHAPMAN: I guess I'm really

20 not following what your logic is. I'm sorry.

21   MS. LOPEZ: Mike, you're probably

22 more familiar with your engineering background.

23 When a job is written, the job is preposted,

24 hopefully, on cable records or the different

25 systems. A lot of times if it's a hot job, it

1   goes out and it goes to posting later on. On

2   those hot jobs, they get updated in LFACS right

3   away because part of the job has to -- LFACS has

4   to line up the counts in order to do the

5   transfers.

6   A lot of times those jobs come back

7   later and are posted later, and we've had quite

8   a few -- a lot of times we will get errors in

9   specific areas where it makes you think did a

10 job just happen where the records aren't

11 updated, when you start catching a couple of

12 them, because a lot of times we'll market

13 certain areas.

14   So my question is when a manual loop

15 makeup is completed, is it also checked -- taken

16 the one extra step and checked against LFACS so

17 that if there is a major discrepancy -- you

18 know, if it's something that's a couple hundred

19 feet difference, it could be somebody added

20 wrong or whatever. But, if it's a couple

21 thousand feet or, you know, if it's a major

22 difference, that might prompt somebody to go

23 back and recheck the records to see if maybe

24 there's a job that was -- that shows it is still

25 open but is -- in actuality, the work has been

1 done and completed and not posted yet.

2   MS. CHAPMAN: Again, as I said,

3 when the engineer gets the loop qualification

4 request, they actually will see any LFACS

5 information that we have for that address. It

6 will actually be prepopulated on the screen that

7 they have to fill out, so they will have that to

8 look at while they are doing their manual loop

9 qualification. So they don't have to actually

10 go through a separate step to do that.

11   MS. LOPEZ: Since we are on loop

12 qual, I just have a couple more real quick. On

13 the 90-day maintenance of the manual loop

14 makeup, has there been a decision or something

15 that's going to keep that information longer or

16 are we still only going to have that for 90

17 days?

18   MS. CHAPMAN: Just a moment. I'm

19 not certain on that. I know we were looking

20 at -- I think that is something that is being

21 covered in the loop qual meetings as far as -- I

22 believe we are working on something that would

23 retain the repeater information because it's not

24 retained anywhere else if that's what you're

25 talking about.

1   But as far as retaining all the loop

2   qual, I don't think we would. But information

3   that's not retained in another database, I know

4   we were looking at that.

5   MS. LOPEZ: We brought that matrix

6   in last time and it had the different columns

7   and said these items would be maintained, and on

8   the manual -- and there are like little X's in

9   each column. And on the manual loop makeup

10   there are all -- all the little boxes were

11   checked, but then down below there was a little

12   statement that said those are only being

13   maintained for 90 days, and they would go into

14   LFACS where a lot of the little boxes were now

15   blank, so we lost -- after 90 days we lose a lot

16   of valuable information.

17   MS. CHAPMAN: Repeaters is --

18   MS. GENTRY: The apparent ones

19   that we talked about that repeaters -- that you

20   retain it on an interim database that's visible.

21   It's a viewing database instead of a hard copy.

22   And after that, that information drops off and

23   it goes into LFACS for your permanent records.

24   And you had said you were going to research of

25   the various items that were available during

1   that manual how many of those you can retain in

2   the permanent LFACS database.

3   MS. CHAPMAN: And again, that

4   particular issue is being -- had been referred

5   to the loop qual if I indication collaborative

6   and trying to work that issue there.

7   MS. GENTRY: And again I just ask

8   you to support them because they're not getting

9   the subject matter experts to be able to resolve

10 those or get answers quickly.

11   MS. CHAPMAN: Well, I would take

12 exception to that. I don't think that's the

13 case. I think part of the case is that we are

14 receiving the same question in four different

15 collaboratives, so we have the same SMEs asking

16 the four questions from four different

17 locations. And this is happening today. And so

18 we are getting a little divided and doing a lot

19 of duplicative effort, which is -- which is

20 inefficient. But --

21   MS. GENTRY: Carol, which

22 collaboratives are you saying you're getting it

23 in? Because in line sharing we've agreed that

24 we don't bring any loop qual to line sharing.

25 Pronto we've agreed we bring no loop qual to

1   pronto. The CLEC forum, we bring no loop qual

2   to CLEC forum. We asked Kathy King to

3   facilitate the process because he comes under

4   her auspice, so to speak. I'm not aware of

5   other ones that we're doing, because I am very

6   much trying to focus on the loop qual.

7   MS. CHAPMAN: And I think now

8   recently that is the case. But until the last

9   just few weeks that hasn't been the case where

10 during the collaboratives these issues were

11 coming up in almost every collaborative. So

12 recently, yes, you are correct that everyone is

13 trying to focus on one collaborative, which is

14 making things much easier to deal with.

15   MS. GENTRY: Would you also

16 reflect I was one of the ones that recommended

17 creating the subteam to do loop qual because of

18 that frustration of going day-to-day,

19 meeting-to-meeting and hearing the same issues

20 and still not having the answers but bringing

21 them up every time.

22   MS. CHAPMAN: Right.

23   MS. GENTRY: So I support the loop

24 qual team. I'm just asking you that some of

25 these issues become quite complex. And if the

1 person that asked them is not on the phone that

2 day, if the CLEC that asks the question is not

3 on the phone that day, and the gentleman that

4 facilitates the team doesn't understand it

5 because he's not a SME, we skip the question and

6 he skips the answer. So we need to figure out a

7 structure because I don't think we need to bring

8 everyone --

9   MS. CHAPMAN: No. It is

10 anti-productive. We would welcome -- if you

11 have a suggestion for how those types of

12 questions could be submitted to the loop qual

13 team so that they could address them, I'm sure

14 we'd welcome that because we definitely do want

15 to try and keep those in one forum.

16   MS. GENTRY: And my questions

17 today were brought there and could not be

18 answered. But those are just examples of the

19 ones that came to mind last week when I created

20 my questions.

21   MS. CHAPMAN: Okay.

22   MS. LOPEZ: I'm sorry, I have one

23 more. And this is for -- and they've gone, but

24 for the people that are dealing with the

25 Richardson project, because it's not all of the

1   zip codes in Richardson, we still market the

2   Richardson area, and we did some loop quals and

3   our folks went ahead and placed orders because

4   they got the loop qual back and it said Apollo

5   Project. We had no idea what the Apollo Project

6   was. And I was finally able to get ahold of Kim

7   Ham who helped -- oh, that's the Richardson

8   project. And the fiber to the curb really

9   doesn't come up -- it comes up on the CSR. It

10 doesn't come up on loop makeup. Right? Does

11 it?

12   MS. HAM: Kim Ham, Southwestern

13 Bell. Actually the fiber to the curb where it

14 tells you how to rebump to the curb is in the

15 VeriGate User Guide. And it tells you under

16 prequal, and it also tells you under loop qual

17 on the detail page where it tells about the

18 detail and on the actual page whether it tells

19 you about the actual, and it tells you what

20 fields should be on the address verification.

21 And I think we started that in discussion back

22 on the -- with the 3-18 loop qual, how you tell

23 about fiber to the curb.

24   MS. CHAPMAN: Yeah, under the loop

25 type.

1   MS. HAM: And in this situation,

2   Ann, which is kind of getting to the documents

3   that Rhythms filed that we weren't going to talk

4   about but since we're talking about them, the

5   LSC made a mistake. Because when we got your

6   LSR, we should have gone through that same

7   process that y'all should have gone through. We

8   should have done that up-front check to see that

9   there was fiber to the curb there and then we

10   would have had to send the order back.

11   So we made a mistake just like y'all

12   did by not checking that in the preorder status.

13   And we sent a note to the LSC to say don't refer

14   to Apollo. Refer to it as fiber to the curb or

15   FTTC. Because that was something they probably

16   assume that they knew and we didn't. So we sent

17   a flash to the LSC to direct them not use the

18   Apollo term; they should refer to it as fiber to

19   the curb or FTTC.

20   MS. LOPEZ: Yeah, we had no idea

21   what the Apollo project was, and it was, like,

22   oh, no, it's another one.

23   MR. SIEGEL: And, Judge Srinivasa,

24   just to respond to your question regarding

25   performance measures, in looking at 1.3 I think

1 the issue there is slightly different than what

2 Ms. Gentry has raised. Because 1.3 deals with

3 just as a system or is the engineering person --

4 are they copying the information that they see

5 on paper correctly when they give it to the CLEC

6 or is the database, if it says X, is the CLEC

7 seeing X.

8   What we're really talking about more so

9 is a situation where the database or the paper

10 says X but in the field it's Y. And I don't

11 think that's what 1.3 measures.

12   MR. WELCH: Mark Welch with

13 Southwestern Bell. It's my understanding that

14 in fact Southwestern Bell would agree with what

15 he said, but it's my understanding that as a

16 part of the performance measures it was to do

17 what had been said here, and that is the

18 accuracy of the information that we're

19 providing.

20   And in fact, as a part of that

21 proceeding, we're filing comments today that

22 clarifies the fact that that performance measure

23 doesn't measure the accuracy of the information

24 that we're providing the CLECs and that we

25 thought that that was a bad idea for a

1   performance measurement. That's what we had

2   said all along.

3   So I appreciate Howard's view on that

4   in that it does confirm that it doesn't tell you

5   the accuracy of the actual loop versus the

6   information that's in the record, in the

7   database, and we would agree with that. There's

8   no way -- the other concern that we had,

9   incidentally, was if you look at the database

10 today, then you try and go back and look at that

11 database in five days, that same loop that --

12 the database referenced the first time may not

13 still be there or another loop may have been

14 disconnected. So it just changes. I mean, it's

15 a robust network that is changing all the time.

16   And so it's interesting that we're

17 talking about that here because those are the

18 same exact concerns that we had as trying to use

19 that as any sort of a performance measurement.

20 We don't think it does anything.

21   MR. SRINIVASA: Well, what I'm

22 hearing is what's actually out there may not be

23 reflected in the database correctly; therefore,

24 the performance measurement may not capture the

25 way it is written -- that's what you're

1 saying -- in the business rule.

2   MR. WELCH: -- that's correct.

3   MR. SRINIVASA: -- somebody going

4 in there manually looking up at the data, they

5 write it down wrong. The database is correct,

6 but you can write it down wrong, that's

7 inaccurate, too, and somebody making an error.

8 It measures that.

9   MR. WELCH: Well, I think that it

10 does measure that if there's some way of knowing

11 what the person saw and what they wrote down. I

12 think that the issue we have is when you go back

13 to relook at that information, the engineer

14 could look at the information twice and not get

15 the exact same information again because we

16 provisioned another loop. So the system picked

17 a different loop whenever it wanted to provide

18 the next set of information on the same request.

19   Or, a loop has been disconnected, so

20 when he went back and looked at it a couple

21 minutes later, it got a loop that was a little

22 bit better. So the information came back a

23 little bit different. That's kind of the

24 concern that we have is you aren't always going

25 to get the exact same information when you make

1   the same request out of that system.

2   MR. SRINIVASA: Well, I think

3   that -- well, you're all -- somebody is filing

4   comments on that I'm sure. Of course PMs were

5   proposed by some of the data CLECs also.

6   They'll file comments, too, if it's something

7   different -- if you're proposing something

8   different.

9   Now, as far as the accuracy is

10   concerned, in principle, I don't know exactly

11   what is there in the PM, I can't recall unless I

12   have it in from of me. Conceptually one would

13   think if there's an error in reading and writing

14   it down, the database is correct but what you

15   provided them is incorrect, in actuality

16   whatever is there is reflected in the database,

17   but you didn't provide it correctly. It

18   captures that. And also that same measure

19   should capture -- okay. You copied something

20   from the database, but, in actuality, it wasn't

21   there. It should capture both scenarios.

22   MS. CHAPMAN: It will only -- the

23   DLR that it's going to measure against is based

24   on the information that the engineer loads in

25   there if he's loading in information, or on the

1 LFACS data that's returned and mechanized. So

2 if it's the exact same loop that's provisioned,

3 then it's always going to match whether the

4 records are right or whether the records are

5 wrong.

6   If the records are wrong, it's still

7 going to match. But if we do conditioning at

8 the CLEC's request, it will never match and it

9 will count against us because the records on the

10 DLR, which is done after provisioning, will have

11 been updated to reflect the conditioning and it

12 will never match and we will be penalized for

13 that.

14   MR. SRINIVASA: Well, say, for

15 example, measures do not match means you found

16 out in the database there was no load coil and

17 in actuality you found out there were load coils

18 but you are going to remove them and you don't

19 charge them anywhere for that.

20   MS. CHAPMAN: But when we did the

21 engineering job to do the load coils, it's going

22 to impact the makeup of the loop. And so the

23 records will not -- the DLR will not match the

24 manual loop record, which is what the

25 measurement says it has to match.

1   Or, again, if, let's say, when we did

2   the loop qual we had this one loop available and

3   then someone disconnected a loop that didn't

4   have -- didn't have load coils, maybe originally

5   had load coils -- somebody disconnected a loop

6   and now we have a non-loaded loop available,

7   then it wouldn't match again and we would be

8   penalized. So it's really not capturing where

9   we said one thing and the loop looks different.

10   All it's doing is measuring -- it comes from the

11   same source. So if it's the same loop, it's

12   always going to match whether it's right or

13   wrong. And if it's not the exact same loop or

14   if we've conditioned the loop that the CLECs

15   request, it will never match. So that's the way

16   the measure is currently written.

17   MS. GENTRY: The only thing I

18   would say, performance measurements aside, just

19   from the practical aspects of doing ordering, is

20   we're seeing approximately 60 percent

21   inaccuracies in what we're getting on loop qual.

22   What I'm trying to do is determine how much it's

23   worth putting a person on this to quantify this

24   percentage that they're seeing.

25   And as you had referenced before, these

1   are not ones that I looked at the loop qual and

2   then five days later submitted the order. It's

3   look at the loop call, submit the order, and it

4   comes to your systems within hours. And I know

5   that things can happen in hours, I understand

6   that. But this is not a delayed thing that I

7   look and wait a week or two and submit. So I'm

8   doing the best I can with the timing that I've

9   got.

10   MS. CHAPMAN: Sure.

11   MS. GENTRY: I guess I don't want

12 to argue if it was 60 percent accurate or not,

13 whatever. It is the largest impediment we have

14 right now with provisioning orders is the fact

15 that the records aren't right and I'm trying to

16 figure out how I set an appropriate customer

17 expectation in addition to an appropriate cost

18 that I'm going to incur for provisioning these

19 customers.

20   MS. CHAPMAN: Right. We

21 understand that that is an issue because, you

22 know, the records are what they are. We make

23 available what we've got, and every data

24 provider has to -- knowing the fact that, yes,

25 based on your own experience how that works for

1 you and how you want to set your customer's due

2 date, but we provide what we've got. If we were

3 to try and provide exact -- exact information on

4 a severed loop that would require us actually

5 physically going out and doing some sort of

6 test, which is going to delay the process again.

7   So, basically, we give you what we

8 have, and it's up to you to decide -- it's going

9 to also depend on if you're typically ordering

10 shorter or longer loops. If you're typically

11 ordering a lot of shorter loops, you know, it's

12 not as great of a risk as if you're ordering the

13 longer loops, which, you know, some of the data

14 CLECs do. You run into more situations where --

15 you know, the difference between 17 and 19 is a

16 big difference as opposed to 7 and 9.

17   And so that's -- it's something that

18 you have to take into account when you're

19 placing the order that that may be an issue, and

20 it's an issue for everybody in the same manner.

21 You know, it was an issue for us when we had a

22 retail offering. It's an issue for our

23 subsidiary because we can only provide the data

24 we've got and provide that and update on

25 on-going basis, but we can provide you what we

1 have.

2   MS. HAM: Jo -- Kim Ham,

3 Southwestern Bell -- the 60 percent that you're

4 seeing, are those 60 percent that come back to

5 you and they have a field left blank or they

6 have zeros or are those --

7   MS. GENTRY: No, it can either

8 be -- it can be like an actual that says there's

9 no loop -- there's no loads.

10   MS. HAM: Actual. So it's not

11 just manual, it's actual, too.

12   MS. GENTRY: Correct, yeah. And

13 what I'm trying to determine is do you take

14 somebody off the desk to try to do this

15 spreadsheet to determine -- and right now we're

16 not in a position to designate a couple of

17 people to do a nice-to-know statistic. But you

18 can also see where my train of thought was a

19 while ago and I was looking at proactively

20 cleaning the database. And I understand the

21 magnitude. It's just the issue that comes back

22 up week after week. And we've been talking

23 about this, actually, year after year. I mean,

24 we talked about this last year.

25   So it's the on-going how do we make it